



Royalties and payments in connection with software

We're releasing a draft practical compliance guideline (PCG) for public consultation in January.

Last updated 11 December 2024

In January 2025, we'll be publishing a draft PCG for public consultation.

The draft PCG will provide guidance about when we consider there is a low risk that cross-border payments in connection with software have been mischaracterised.

The PCG will provide practical guidance relating to our view set out in draft Taxation Ruling TR 2024/D1 *Income tax: royalties - character of payments in respect of software and intellectual property rights*.

We've prioritised this draft guidance having regard to feedback received on TR 2024/D1 during our public consultation earlier in 2024. We encourage you to engage with us during the public consultation period to shape our administrative approach and to ensure our final guidance provides greater certainty on what our view in TR 2024/D1 will mean in practice.

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